

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHANICE KLOSS, individually and on behalf of similarly situated individuals,)	
)	No. 18-cv-7986
Plaintiff,)	Judge John Robert Blakey
)	
CASHCRATE, LLC, a Nevada limited liability,)	Magistrate Judge Maria Valdez
)	
Defendant.)	
)	

**DEFENDANT'S UNOPPOSED MOTION FOR
EXTENTION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant CashCrate, LLC (“CashCrate”), through its attorneys, and pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an order extending the time for it to answer or otherwise respond to Plaintiff’s Complaint up and until January 25, 2019. In support thereof, CashCrate states as follows:

1. On October 30, 2018, Plaintiff filed an action in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, captioned *Shanice Kloss v. CashCrate, LLC*, Case No. 18 CH 13520. The Complaint was filed on behalf of a putative class and alleged claims for: (a) violation of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505/1, *et seq.*, (b) breach of contract, (c) breach of implied contract, and (d) negligence. (*See* Complaint attached as Exhibit A to Dkt. 1.)
2. CashCrate filed a notice of removal to this Court on December 4, 2018.
3. Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendant’s deadline to answer or otherwise plead is currently December 11, 2018.

4. Defendant seeks an extension of an additional forty-five (45) days to file its responsive pleading, up to and including Friday, January 25, 2019. Defendant continues to investigate and evaluate the allegations of the Complaint, and an extension will ensure adequate time to do so and to draft an appropriate responsive pleading. Defendant also has submitted initial informal discovery materials to Plaintiff.

5. The undersigned counsel conferred with counsel for Plaintiff by telephone on December 5, 2018 regarding this request for additional time. Counsel for Plaintiff had no objection to this extension.

6. This motion is timely under Federal Rule of Civil Procedure 6(b)(1)(A), and has not been brought for purpose of delay or harassment.

WHEREFORE, CashCrate respectfully requests the Court to grant this motion and enter an order extending the date for CashCrate to file a responsive pleading to the Complaint up to and including Friday, January 25, 2018.

Dated: December 5, 2018

Respectfully submitted,

CASHCRATE, LLC

By: /s/ Steven Wernikoff

Steven M. Wernikoff
Vikram A. Mathrani
Honigman Miller Schwartz and Cohn LLP
155 North Wacker Drive, Suite 3100
Chicago, IL 60606
Telephone: 312-701-9300
Facsimile: 312-701-9335

Counsel for Defendant CashCrate, LLC

CERTIFICATE OF SERVICE

I, Steven Wernikoff, hereby certify that I caused a copy of the foregoing
Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Complaint to
be served on counsel below via FedEx overnight delivery and email on December 5, 2018.

Jad Sheikali
William Kingston
McGuire Law, P.C.
55 W. Wacker Dr., 9th Floor
Chicago, IL 60601
jsheikali@mcgpc.com
wkingston@mcgpc.com

/s/ Steven Wernikoff
Steven Wernikoff